

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MARNEY DURANJACOME,)	
)	C.A. No: 06-186 JJF
Plaintiff,)	
)	
v.)	NON-ARBITRATION CASE
)	
NATASHA JOYNES and RHONDA)	JURY TRIAL DEMANDED
REYNOLDS,)	
)	
Defendants.)	

DEFENDANTS' RESPONSES UNDER RULE 26(a)(1)

A. Give the name and present or last known residential and employment address and telephone number of each individual likely to have discoverable information.

ANSWER: All persons identified by Plaintiff in her Responses under Rule 26(a) and in addition:

1. Robin Kearse 109 E. Jewel St. Delmar De 19940 302-846-3880 -
eye witness
2. Michael Brooks, M.D. Expert witness, 27 Clayburgh Rd., Thornton
PA 19373
3. Representatives of Nationwide Mutual Insurance Company

B. Documents and things in the possession of counsel or party that may be used to support the disclosing parties claims or defenses.

ANSWER: Three photocopies of photographs of the accident scene.
Two Photocopies of photographs of the Plaintiff's vehicle.
Diagram of accident scene.

C. Insurance agreement

ANSWER: Nationwide Mutual Insurance Company

Policy # 5207K000475

\$100,000/\$300,000 policy limits

D. Expert Testimony

ANSWER: Unknown which experts will testify at trial.

REGER, RIZZO, KAVULICH & DARNALL, LLP

By: /s/ Arthur D. Kuhl, Esquire
Arthur D. Kuhl, Esquire, # 3405
1001 Jefferson Street
Suite 202
Wilmington DE 19801
302-652-3611
Attorney for Defendants

Dated: June 20, 2006

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CERTIFICATE OF SERVICE

I certify that I have caused copies of the foregoing Responses Under Rule 26(a)
to be served by e-filing on July 12, 2006 upon:

Matthew R. Fogg, Esquire
Doroshow Pasquale Krawitz & Bhaya
1202 Kirkwood Highway
Wilmington De 19805
Attorney for Plaintiff
302-998-0100

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